

**GOTLIB LAW**

December 9, 2024

**MEMO ENDORSED**

*Via* ECF

The Honorable Laura Taylor Swain  
Chief United States District Court Judge  
U.S. District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Liu, et al.*, 21 Cr. 592 (LTS)

Dear Chief Judge Swain,

I represent Jonathan Laqui in the above-captioned matter. I write, with the consent of the U.S. Pretrial Services Office (“Pretrial”) and without objection from the government, to respectfully request that the terms of Mr. Laqui’s bond be temporarily modified to permit him to travel to Chicago, Illinois and all points in between Chicago, Illinois, and New Jersey from December 21 through December 31, 2024.

Mr. Laqui was arrested on September 13, 2023 and released on bond that same day. Mr. Laqui’s conditions of release include, among others, his travel restricted to the Southern and Eastern Districts of New York and the District of New Jersey. Mr. Laqui has complied with all the conditions of his pretrial release to date.

The requested temporary travel modification would allow Mr. Laqui to travel with his children and wife to visit relatives for the holidays. I have provided general information regarding the details of Mr. Laqui’s travel to the government and Pretrial. If the Court approves this request, I will provide the government and Pretrial with detailed information concerning his travel plans once they are confirmed. Pretrial Officers Jazzlyn Harris and Sophia Grigolo consent to this request and the government defers to Pretrial.

Accordingly, I respectfully request that the Court modify the terms of Mr. Laqui’s pretrial release to permit him to travel to Chicago, Illinois and all points in between Chicago, Illinois and New Jersey from December 21 through December 31, 2024. I thank the Court for its consideration.

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Respectfully Submitted,

/s/

Valerie A. Gotlib

Cc: All counsel of record (*via* ECF)  
Jazzlyn Harris Finneran, U.S. Pretrial Officer (*via* Email)  
Sophia Grigolo, U.S. Pretrial Officer (*via* Email)

The foregoing request is granted. DE # 330 is resolved.

SO ORDERED.

12/9/2024

/s/ Laura Taylor Swain, Chief USDJ